

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: D.I. 760, 854 & 945

**WITNESS AND EXHIBIT LIST OF BV WOLF CREEK, LLC RELATING TO
MATTERS SCHEDULED FOR HEARING ON JULY 31, 2025 AT 9:30 A.M. (ET)**

BV Wolf Creek, LLC (“BV” or “Landlord”), by its attorneys, hereby submits this Witness and Exhibit List for the hearing to be held on July 31, 2025, at 9:30 a.m. (ET) (the “Hearing”) with respect to the following matters and any related matters going forward at the Hearing:

1. *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [D.I. 760];
2. *Objection to Proposed Assumption and Assignment of BV Wolf Creek, LLC Lease to Burlington Coat Factory Warehouse Corporation, and Objection to Proposed Form of Assumption Order and, in particular, to the proposed assignment of the BV Lease (as defined herein) to Burlington Coat Factory Warehouse Corporation* [D.I. 854]; and
3. *Amended Objection to Proposed Assumption and Assignment of BV Wolf Creek, LLC Lease to Burlington Coat Factory Warehouse Corporation, and Objection to Proposed Form*

¹ The Debtors in these cases, together with the last four digits of each Debtor’s taxpayer identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, OH 44236.

of Assumption Order and, in particular, to the proposed assignment of the BV Lease (as defined herein) to Burlington Coat Factory Warehouse Corporation [D.I. 945].

EXHIBIT LIST

BV designates the following exhibits that may be used at the Hearing:

EXHIBIT	Description
A	Wolf Creek Center, LLC's lease with Joann Stores, LLC dated November 11, 2014
B	Ross Dress for Less Inc.'s lease with Wolf Creek Plaza dated March 8, 2018
C	Letter from Ross Dress for Less, Inc. to BV Wolf Creek dated May 5, 2025

RESERVATION OF RIGHTS

BV reserves (a) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing and add witnesses and/or exhibits, as applicable, and (b) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. BV also reserves the right to rely upon and use as evidence (a) exhibits included on the exhibit list of any other parties in interest, and (b) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: July 29, 2025
Wilmington, Delaware

ESBROOK P.C.

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-and-

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